

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

KELLY DAWSEY,

Plaintiff,

v.

BAYERISCHE MOTOREN WERKE
AKTIENGESELLSCHAFT and BMW
MANUFACTURING CO., LLC collectively
d/b/a “BMW GROUP,”

Defendants.

C.A. No. 7:22-cv-03738-TMC-KFM

**DEFENDANT BAYERISCHE MOTOREN WERKE
AKTIENGESELLSCHAFT’S REQUEST FOR PROTECTION**

COMES NOW Defendant, Bayerische Motoren Werke Aktiengesellschaft (BMW AG), pursuant to the Court’s direction at the May 6 status conference (ECF No. 128), and requests protection for the following dates from December 1, 2025, through March 31, 2026.

<u>Dates</u>	<u>Attorney/Witness</u>	<u>Reason for Protection</u>
February 5-9	Kurt Rozelsky	SC ACTL Meeting, Bluffton
March 12-22	Kurt Rozelsky	Family vacation

Respectfully submitted this the 26th day of June. 2025.

By: s/ Kurt M. Rozelsky
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